

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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FEDERAL TRADE COMMISSION,

Plaintiff,

v.

DIRECT MARKETING CONCEPTS, INC., et al.,

Defendants.

Civ. No. 04-11136-GAO

**JOINT REQUEST FOR ENTRY OF THE PREVIOUSLY FILED STIPULATED FINAL
ORDERS BETWEEN THE FEDERAL TRADE COMMISSION AND HEALTHY
SOLUTIONS, LLC, HEALTH SOLUTIONS, INC., MICHAEL HOWELL, GREG
GEREMESZ AND ALEJANDRO GUERRERO**

On July 26, 2005, Plaintiff Federal Trade Commission ("Commission") requested that the Court not enter two Stipulated Final Orders that had previously been submitted by the Commission [Dkt. #99]. Those Orders were, respectively, with: (1) Defendants Alejandro Guerrero and Health Solutions, Inc. [Dkt. # 93] , and (2) Defendants Healthy Solutions, LLC, Gregory Geremesz, and Michael Howell [Dkt. # 98]. The Commission stated that it had just become aware of recent developments in a related case, *ITV Direct, Inc. v. Healthy Solutions, LLC, et al.* (Civil Action No. 04-CV-10421-JLT), that might affect those settlements, and thus needed to be assessed by the Commission.

On July 27, 2005, Defendants Healthy Solutions, LLC, Health Solutions, Inc., Michael Howell, Greg Geremesz and Alejandro Guerrero filed a response, in which they urged the Court to enter those Stipulated Final Orders [Dkt. #100].

The Commission and Defendants Healthy Solutions, LLC, Health Solutions, Inc., Geremesz, Howell, and Guerrero have now resolved the concerns raised by the referenced events

in *ITV Direct, Inc. V. Healthy Solutions, LLC* . Accordingly, the undersigned parties respectfully request that the Court enter the Stipulated Final Judgments between the Commission and these Defendants.

Respectfully submitted,



DANIEL KAUFMAN
KIAL S. YOUNG (BBO # 633515)
EDWARD GLENNON
Federal Trade Commission
600 Pennsylvania Avenue, NW; Suite NJ-3212
Washington, DC 20580
(202) 326-2675, -3126 (voice); (202) 326-3259 (fax)
dkaufman@ftc.gov or eglennon@ftc.gov
ATTORNEYS FOR PLAINTIFF



9-02-05

BECKY V. CHRISTENSEN,
O'Connor Christensen & McLaughlin LLP
1920 Main Street, Suite 150
Irvine, CA 92614
(949) 851-5000 (voice); (949) 851-5051 (fax)
bchristensen@ocmplaw.com
ATTORNEY FOR DEFENDANTS HEALTHY SOLUTIONS, LLC,
HEALTH SOLUTIONS, INC., MICHAEL HOWELL,
GREGORY GEREMESZ, AND ALEJANDRO GUERRERO

~~September~~
Dated: ~~August~~ 7, 2005

CERTIFICATE OF SERVICE

My name is Edward Glennon and I am an attorney with Federal Trade Commission. On September 7, 2005, a copy of Joint Request for Withdrawal of Plaintiff Federal Trade Commission's Motion Requesting That Previously Submitted Stipulated Final Orders Not Be Entered and of Healthy Solutions, LLC, Health Solutions, Inc., Michael Howell, Greg Geremesz, and Alejandro Guerrero's Response to FTC's Request Not to Enter Stipulated Orders was served via facsimile and first class mail as follows:

Becky V. Christensen, Esq. (for Michael Howell, Greg Geremesz, Healthy
O'Connor Christensen & McLaughlin LLP Solutions, LLC, Alejandro Guerrero and Health
1920 Main Street, Suite 150 Solutions, Inc)
Irvine, CA 92614
Facsimile: (949) 851-5051

Dustin F. Hecker (for Michael Howell, Greg Geremesz, Health Solutions,
Posternak Blankstein & Lund LLP LLC, Alejandro Guerrero and Health Solutions, Inc)
The Prudential Tower
800 Boylston Street
Boston, Massachusetts 02199-8004
Facsimile: (617) 722-4927

Chris Robertson, Esq. (for Direct Marketing Concepts, Inc., ITV Direct, Inc., Donald
Seyfarth Shaw, LLP W. Barrett, and Robert Maihos
World Trade Center East
Two Seaport Lane, Suite 300
Boston, MA 02210
Facsimile: (617) 946-4801

Joseph Ryan (for Triad ML Marketing, Inc., King Media, Inc., Allen
Lyne, Woodworth & Evarts LLP Stern, Lisa Stern, and Steven Ritchey)
600 Atlantic Avenue
Boston, MA 02210
Facsimile: (617) 248-9877

Sage International, Inc. (for BP International, Inc.)
Attention: Molly Wheeler
1135 Terminal Way, Suite 209
Reno, NV 89502
Facsimile: (775) 786-2013

Brad Keene, Esq. (for BP International, Inc.)
Keene & Gizzi
220 Broadway, Suite 402
Lynnfield, MA 01940
Facsimile: (781) 346-6355

I declare under penalty of perjury that the foregoing is true and correct. Executed this September 7, 2005 at Washington, D.C.



Edward Glennon